

Appl. No. 10/092,832
Reply to Office Action of March 22, 2004

REMARKS

Claims 1-21 stand in this application. Reconsideration and allowance of the standing claims are respectfully requested.

Claims 1-21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over copending Application No. 10/145,998 and document number XP-000870630 (Rosenberg) in view of document number XP-002242382 (Schulzrinne). Due to acceptance of the Terminal Disclaimer submitted on March 1, 2004, Applicant presumes that this rejection is limited to Rosenberg in view of Schulzrinne, and will respond accordingly. Applicant respectfully requests reconsideration and removal of this rejection.

Claims 1-9 define over Rosenberg in view of Schulzrinne. Claims 1-9 recite "a proxy server to receive and store a first table for address translation and registration of plural terminals associated therewith" and "a pass through server connected to said data network and through which information between said proxy server and any of said terminals passes, said pass through server including a second table that mirrors said first table." According to the Office Action, Rosenberg discloses the "proxy server" and "pass through server" as the local SIP proxy server and the redirect server for company.com, respectively. Office Action, Page 2. Applicant respectfully disagrees.

Applicant submits that a redirect server does not comprise a "pass through server" as recited in claims 1-9. As recited in claims 1-9, the proxy server has a first table for address translation and registration of terminals associated with the proxy server. The first table may include, for example, a SIP register list. Specification, Page 13, Lines 21-

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27. The pass through server has a second table that mirrors the first table. The redirect servers disclosed by Rosenberg and Schulzrinne, however, do not have "a second table that mirrors said first table" as recited in claims 1-9. By definition, a redirect server operates to redirect a caller to another address for the called party. Rosenberg, Page 43, Col. 1: Paragraph 2, and Schulzrinne, Page 135, Col. 1, Paragraph 3. Consequently, the redirect servers disclosed by Rosenberg and Schulzrinne could not have a second table that mirrors a first table of the local SIP proxy server, since the redirect addresses would be different from the original addresses stored in the SIP register list for the local SIP proxy server. As stated in the Specification, "[i]t should be noted that the pass through proxy 801 should not be a redirect server, since that would cause the proxy server 502 to not reflect the same data as that stored in the pass through proxy 801." Specification, Page 13, Lines 25-28. Accordingly, removal of this rejection for claims 1-9 is respectfully requested.

Claims 10-16 also define over Rosenberg in view of Schulzrinne. Claims 10-16 recite the feature of "in response to said fake inbound call message, initiating an Internet telephone call from said calling terminal." According to the Office Action, a proxy request comprises a "fake inbound call message" as recited in claims 10-16 since it contains a "fake ID of user Joe." Office Action, Page 6. As an initial matter, a proxy request is only generated after a call terminal has already initiated a call request. As stated by Rosenberg:

"The caller, also known as the user agent client (UAC), creates an INVITE request for some user, sip:joe@company.com. This request is forwarded to a local SIP proxy server (1). The proxy looks up company.com in the Domain Name Services (DNS), and obtains the IP address of a server handling SIP requests for this domain. It then proxies the request to this server (2)."

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Rosenberg, Page 43, Col. 1, Paragraph 2. As made clear by Rosenberg, a proxy request is not used to initiate a call request, but is generated in response to a call request. Consequently, a proxy request cannot be used for "initiating an Internet telephone call from said calling terminal" as recited in claims 10-16. Further, the proxy request disclosed by Rosenberg does not include a "fake ID of user Joe." The address "sip:joe@company.com" is a real address for a user Joe that may be used for a call connection to the user unless redirected to another address for call forwarding purposes. Removal of the rejection for claims 10-16 is therefore respectfully requested.

Claims 17-21 also define over Rosenberg in view of Schulzine. Claims 17-21 recite "receiving commands from an applications computer" and "causing one or more terminals to initiate Internet telephone calls." According to the Office Action, the UAC is an application computer. As recited in claims 17-21, however, the commands from the application computer cause one or more terminals to initiate Internet telephone calls. Consequently, the application computer and terminals are separate devices. Rosenberg does not disclose the UAC instructing another terminal to initiate an Internet telephone call. Removal of the rejection for claims 17-21 is therefore respectfully requested.

For at least the above reasons, Applicant submits that claims 1-21 recite novel features not shown by the cited references. Further, Applicant submits that the above-recited novel features provide new and unexpected results not recognized by the cited references. Accordingly, Applicant submits that the claims are not anticipated nor rendered obvious in view of the cited references.

It is believed that claims 1-21 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

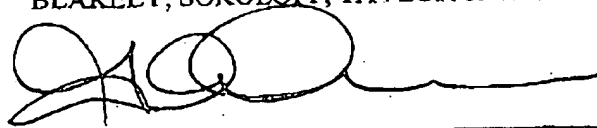
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The Examiner is invited to contact the undersigned at 724-933-3387 to discuss
any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any
overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



John F. Kacvinsky, Reg. No. 40,040
Under 37 CFR 1.34(a)

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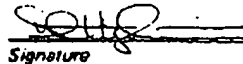
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